

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

RONALD GONDA,

Plaintiff,

v.

METROPOLITAN LIFE INSURANCE COMPANY
and WILLIAM FRIEDT, JR.

Defendants.

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) CIVIL ACTION NO. 00-2286
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) CHIEF JUDGE AMBROSE
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**METROPOLITAN LIFE INSURANCE COMPANY’S AND WILLIAM FRIEDT, JR.’S
PROPOSED VOIR DIRE**

Defendants Metropolitan Life Insurance Company (“MetLife”) and William Friedt, Jr. hereby submit the following proposed voir dire questions pursuant to the Pre-trial Order of the Court dated February 1, 2006.

1. What is your name?
2. What is your date of birth?
3. Where were you born?
4. Where do you live?
5. Are you married? If so, what is your spouse’s name?
6. Do you have any children? If so, what are their names and ages?
7. What is the name and location of the high school you attended?

8. What is the name and location of the college or university you attended, if any?
9. Did you graduate? If so, with what type of degree(s)?
10. What do you do for a living? Who is your employer?
11. What does your spouse do for a living? Who is your spouse's employer?
12. If you have adult children, please describe what they do for a living and list their employers.
13. If you or your spouse were in the military service, please provide for each the branch, dates of service, and rank attained.
14. Have you ever been a plaintiff in a lawsuit? If so, please describe the nature of that lawsuit and the result of it.
15. Have you ever been a defendant in a lawsuit? If so, please describe the nature of that lawsuit and the result of it.
16. Have you ever been a defendant in a criminal action? If so, please describe the circumstances that led to those proceedings and the result.
17. Have you previously served on a civil trial jury? If so, what was the nature of the case? Did the jury reach a verdict in each case? If so, what was the verdict?
18. Have you served on a criminal trial jury? If so, what was the nature of the case? Did the jury reach a verdict in each case?

19. Have you ever testified as a witness in a case? If so, what was the nature of the case and your relationship to it?

20. Do you have any family members or friends who are lawyers or who work in the court system? If so, please provide their names. Do you know the nature of their practice?

21. Do you work, or have you ever worked, for a federal, state, or local governmental office or agency? If so, please provide details.

22. Do you work, or have you ever worked, for MetLife? If so, when, where, and in what position?

23. Do you work, or have you ever worked, for any other insurance company? If so, when, where, for what company, and in what position?

24. Do you have any family members or friends that work, or ever worked, for MetLife? If so, when, where, and in what position?

25. Do you have any family members or friends that work, or ever worked, for any insurance company? If so, when, where, for what company, and in what position?

26. Do you own, or have you ever owned, a MetLife insurance policy? If so, please describe the policy.

27. Do you have any family members or friends who own, or have ever owned, a MetLife insurance policy? If so, please provide details.

28. Do you own, or have you ever owned, a life insurance policy? If so, when, what kind, in what amount, and from what company?

29. Have you ever applied for a MetLife insurance policy and been denied? If so, please describe.

30. Have you ever applied for any other insurance policy and been denied? If so, please describe.

31. Have you ever made a claim for coverage under any type of insurance policy, such as a life insurance policy, a health insurance policy, a homeowner's insurance policy, or an auto insurance policy? If so, please describe.

32. Has any insurance company ever denied any claim for coverage that you made? If so, please describe.

33. Do you own stock in MetLife?

34. Do you own stock in any other life insurance company? If so, what company?

35. Do you know Ronald Gonda?

36. Do you know any family members or friends of Ronald Gonda?

37. Do you know William Gerald Friedt, Jr.?

38. Do you know any family members of William Gerald Friedt, Jr.?

39. Do you have any physical or mental condition that would affect your ability to serve on the jury? If so, please describe.

40. Do you have any pressing personal or business obligations that would make jury service difficult at this time? If yes, what is the nature of the difficulty?

41. Do you know of the law firm of Behrend & Ernsberger, P.C., or any of plaintiff's lawyers, Kenneth Behrend, James DePasquale, or Kevin Miller?

42. Do you know of the law firm of McCarter & English, LLP., Thorp Reed & Armstrong, LLP, or defendant's lawyer, B. John Pendleton, Jr.?

43. Do you know any of the following individuals:

Theodossios Athanassiades	Ronald Gonda
James Rayl	William Gerald Friedt, Jr.
Gregory T. Snider	Edmund G. Rakowski
Joseph Paros	Beverly Loy Taylor
Wilhelmenia Taylor	Kenneth Daniels
Robert Carter	Harry P. Kamen
Rebecca Greene	

44. Do you have any bias or prejudice against corporations or big businesses? If so, please describe.

45. Do you have any bias or prejudice against insurance companies or financial services companies or their sales representatives? If yes, please explain.

46. In this case, plaintiff claims that the Defendants misled or deceived him into buying an insurance policy. Defendants deny that it did so. Do you believe that you have ever been misled or deceived into buying something? If so, please describe.

47. Have you seen any newspaper or magazine articles or seen anything on television, besides commercials, about MetLife? If so, please describe what you saw.

48. Do you have any general opinion about punitive damage awards in civil lawsuits? If so, please describe.

49. Have you read, seen, or heard anything about this case from any source? If yes, what have you read, seen, or heard about this case?

50. Are you aware of any reason why you would not be able to serve as a fair and impartial juror in this case if selected? If yes, what is the reason?

Dated: July 17, 2006

By: s/ B. John Pendleton Jr.

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Attorneys for Defendants
Metropolitan Life Insurance Company
and William Friedt, Jr.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document was served on July 17th, 2006 on the following counsel of record via the electronic filing service:

Kenneth R. Behrend, Esq.
Behrend and Ernsberger, P.C.
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s/ B. John Pendleton, Jr.